

Exhibit H

11/17/2003 MON 23:01 FAX

002/007

Rules Committee

Locals 799 800 & 805

TO UNION MEMBER

Stephen Keefe

LOCAL

805

THE I.L.A. RULES COMMITTEE, WHO ARE EMPOWERED BY RULE #37 OF THE HIRING HALL RULES, ARE HEREBY NOTIFYING YOU TO APPEAR BEFORE THEM.

THE COMMITTEE SUMMONS YOU ON THIS DATE OF

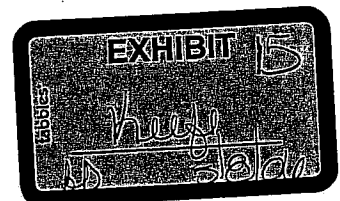
FEB 6, 2003

AT 12 NOON TO APPEAR AT THE HIRING HALL.

THE PURPOSE OF THIS HEARING IS FOR YOU TO SHOW JUST CAUSE AS TO WHY YOU SHOULD NOT BE SUSPENDED AND PLACED INTO GANG #12. PLEASE BRING WITH YOU ANY RESIGNATION AND/RETIREMENT PAPERS, TAX RETURNS OR ANY DOCUMENTS THAT YOU DEEM PERTINENT.

WE HAVE FOUND YOU TO BE IN VIOLATION OF NOT HONORING THE PLEDGE THAT YOU SIGNED. FAILURE TO APPEAR AT THIS HEARING COULD ALSO RESULT IN A SANCTION.

THE MEMBERS OF THE I.L.A.
RULES COMMITTEE,
LOCALS #799, #800, #805



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PAGES 1-124
EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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1 box in Green Harbor?
 2 A. That is where our mail is delivered.
 3 Q. How long has your mail been delivered
 4 to that post-office box?
 5 A. Forever.
 6 Q. More than 20 years?
 7 A. Yeah.
 8 Q. Have you ever changed that post-office
 9 box in the last 20 years?
 10 A. No.
 11 Q. Have you ever had any other address
 12 that you received mail at in the past 20 years?
 13 A. No.
 14 MR. MAHONEY: Let's mark these as
 15 the next few exhibits.
 16 (Exhibit-15, Letter Dated 2/6/03;
 17 Exhibit-16, Rules; Exhibit-17,
 18 Certificate; Exhibit-18, Letter;
 19 Exhibit-19, Letter; Exhibit-20,
 20 Letter, marked for
 21 identification.)
 22 BY MR. MAHONEY:
 23 Q. I'm going to show you what we've
 24 marked as Exhibit 15 and ask if you have ever

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1 seen this document before?
 2 A. Yes.
 3 Q. Did you receive that prior to February
 4 6, 2003?
 5 A. I think so, yeah.
 6 Q. I'm going to show you what has been
 7 marked as Exhibit 16 and ask if you have ever
 8 seen that before?
 9 A. Yes.
 10 Q. Did you receive that in February of
 11 2003?
 12 A. Yes.
 13 Q. I'm going to show you what we marked
 14 as Exhibit 14 and ask you, do you recognize
 15 that to be a copy of a -- you know, those green
 16 cards that you get from certified mail?
 17 A. One of these, I didn't receive.
 18 Q. Is that your signature on that last
 19 exhibit that I just showed you?
 20 A. Yes.
 21 Q. I'm going to show you what we marked
 22 as Exhibit 18.
 23 Have you ever seen Exhibit 18 before?
 24 A. Yes.

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1 Q. When did you see Exhibit 18 for the
 2 first time?
 3 A. I don't remember.
 4 Q. Was it sometime in March of 2003?
 5 A. It could have been.
 6 Q. I'm going to show you what we marked
 7 as Exhibit 19.
 8 Have you ever seen that before?
 9 A. Yes.
 10 Q. When did you first see Exhibit 19?
 11 A. I don't remember.
 12 Q. Was it sometime in March of 2003?
 13 A. It could have been, yeah.
 14 Q. With regard to Exhibit 20, have you
 15 ever seen this document before? I will
 16 represent to you that was an attachment that
 17 Mr. Picard sent in his letter to Mr. McNamara.
 18 A. I don't remember ever getting anything
 19 from Joe Picard.
 20 Q. Why don't you read what is in Exhibit
 21 20, and then I'm going to have some questions
 22 about what is contained in that.
 23 A. (Witness reviewing document.)
 24 Q. By the way, Mr. Keefe, are you suing

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1 for your legal fees in this case?
 2 A. I don't know yet.
 3 Q. Have you spent any money in payment to
 4 your lawyer in this case?
 5 A. Yes.
 6 Q. Are you paying Mr. Lathrop yourself?
 7 A. No.
 8 Q. Who is?
 9 A. My brother.
 10 Q. That is your brother Tim?
 11 A. Yes.
 12 Q. Can I see that last exhibit, please,
 13 for a moment?
 14 A. (Witness complying.)
 15 Q. Thank you.
 16 Now, you have never spoken to
 17 Mr. Picard about this case or your suspension;
 18 is that right?
 19 A. No.
 20 Q. You appeared at a rules committee
 21 meeting on March 5, 2003; isn't that true?
 22 A. I think so.
 23 Q. And what was your understanding of why
 24 you had to appear at that rules committee

25 (Pages 94 to 97)